

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: BP p.l.c. SECURITIES LITIGATION

Civil Action No. 4:10-md-2185

In re: BP ERISA LITIGATION

Civil Action No. 4:10-cv-4214

Honorable Keith P. Ellison

**JOINT DECLARATION OF LORI G. FELDMAN AND RONALD S. KRAVITZ IN
SUPPORT OF ERISA PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO
DISMISS THE CONSOLIDATED COMPLAINT**

Pursuant to 28 U.S.C. § 1746, Lori G. Feldman and Ronald S. Kravitz declare as follows:

1. I, Lori G. Feldman, am admitted to practice *pro hac vice* before the District Court for the Southern District of Texas in this action. I am a partner in the firm of Milberg LLP, and I am one of the Interim Co-Lead Counsel for Plaintiffs in this litigation.

2. I, Ronald S. Kravitz, am admitted to practice before the District Court for the Southern District of Texas. I am a partner in the firm of Liner Grode Stein Yankelevitz Sunshine Regenstein & Taylor LLP, and I am one of the Interim Co-Lead Counsel for Plaintiffs in this litigation.

3. We make this joint declaration in support of ERISA Plaintiffs' Opposition to Defendants' Motion to Dismiss the Consolidated Complaint.

4. Attached hereto as Exhibit 1 is a true and correct copy of the Stipulation Governing Discovery, dated January 31, 2011, Docket 96.

5. Attached hereto as Exhibit 2 is a true and correct copy of a letter from Morgan D. Hodgson to Ronald S. Kravitz and Lori G. Feldman, dated March 9, 2011, and Appendix A thereto.

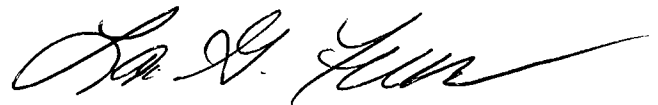
6. Attached hereto as Exhibit 3 is a true and correct copy of a letter from Morgan D. Hodgson to Ronald S. Kravitz and Lori G. Feldman, dated May 19, 2011, and the attachment thereto.

7. Attached hereto as Exhibit 4 is a true and correct copy of a letter from the Plan Administrator to Participants, dated October 14, 2008, which is publicly available at <http://hr.bpglobal.com/LifeBenefits/Assets/Documents/a/Announce-NTI-core-Letter-FAQs.aspx>.

8. Attached hereto as Exhibit 5 is a true and correct copy of the Investment Options Guide, updated as of April 2007, Bates' No. BPGOM ERISA 0003670 - 3751.

We declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of September, 2011.



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